

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MATTEL, INC., :

Plaintiff, :

- against - :

1:20-cv-11075 (NRB)

THE ENTITIES DOING BUSINESS :

AS GOODMENOW AT THE URL :

GOODMENOW.COM, THE ENTITIES :

DOING BUSINESS AS :

MEETGOODTIMES AT THE URL :

MEETGOODTIMES.COM, :

THE ENTITIES DOING BUSINESS AS :

FEELITNICE AT THE URL :

FEELITNICE.COM, THE ENTITIES :

DOING BUSINESS AS THE PAYPAL :

MERCHANT YOKAWA NETWORK :

LIMITED, JOHN DOE NOS. 1-5, AND :

ABC ENTITY NOS. 1-5, :

Defendants. :

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JOINT MOTION FOR PROTECTIVE ORDER

IT IS HEREBY JOINTLY MOVED and agreed by and between the undersigned counsel for the parties, subject to the approval of the Court, that the proposed Protective Order, attached hereto as Exhibit 1, should be entered as an order of this Court.

The parties agree that a Protective Order is necessary in this matter, due to the anticipated production of confidential business information. The parties have agreed that the proposed Protective Order balances the needs of both parties.

Dated: New York, New York
August 31, 2021

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